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January 29, 2021

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

We write pursuant to this Court's January 27, 2021, Order requesting that counsel advise the Court as to how much time counsel needs to respond to the Government's restitution request (Dkt. 997). We are currently unable to speak with Mr. Raniere at his facility, as he is in isolation due to the BOP's COVID-19 Protocols. We expect that Mr. Raniere may be able to speak with us in 14-21 days. If that timeline is accurate, we request that we have at least thirty days from today to respond to the Government's request. We have spoken with AUSA Tanya Hajjar and she consents to this request.

Respectfully submitted,



Marc A. Agnifilo, Esq.
Teny R. Geragos, Esq.

cc: AUSA Tanya Hajjar (via ECF)